

From: Ted Thompson [TThompson@iccl.org]
 Sent: Wednesday, January 05, 2005 1:07 PM
 To: Hetty Richardson (E-mail)
 Cc: Michael Crye; Amy Powers (E-mail); Brian Nutter (E-mail); John Delahanty (E-mail); Armando Rodriguez-Disney (E-mail); Ben Newlin-Disney (E-mail); Bill Wright (E-mail); Carnival - Tom Dow; Carolyn Cresswell; Christian Sauleau (E-mail); Crystal - Joe Valenti; Dan Grausz; Dawn Gunning (E-mail); Domenico Rognoni, Carnival; Donna Spalding, NWCA; Elaine Helderwier (E-mail); Ernesto Gori, Costa; Frank de Heer-Disney (E-mail); George Wright (E-mail); Greg Purdy (E-mail); James Hunn (E-mail); Jim Kross; Jim Van Langen - (E-mail); Kelly Clark (HAL) (E-mail); Kenneth Fortier (E-mail); Mike Williams; Nick Schowengerdt-HAL (E-mail); NWCA - John Hansen; Peter Randall; Randall Fiebrandt; Ray Martus; Renato Storari, Marine EngineerCARNIVAL; Rene Roussel Captain (E-mail); Rich Pruitt (E-mail); Robert Spicer (CCL) (E-mail); Roberto Martinoli - Carnival/Costa (E-mail); Stan Deno; Tom Greene; Tom Strang C. Eng., M.R. I. N. A. (E-mail)
 Subject: More: Comment on Draft Ch. 532, Large Commercial Passenger Vessels

Importance: High

Dear Ms. Richardson: I have been asked to clarify and correct our statement below. We are informed that laboratories are not EPA certified but rather states certify the laboratories using EPA standards. I trust you realize that this is not the primary point of the comment but rather, we believe there is a need to assure that the various states accept the testing and results from laboratories certified by other states as sending multiple samples to different states would not be possible as stated because of the limit on hold times between when samples are drawn and the tests conducted.

I appologize for this misunderstanding on my part an hope that this has not inconvenienced you. As we stated, ICCL will work with you and our members to address and solve this issue.
 Regards, Ted

Dear Ms. Richardson: In accordance with information on the State of Maine web site we would like to comment on Cruise Ships -- Draft Ch. 532, Large Commercial Passenger Vessels - paragraph 5.A.6.

Paragraph 5.A.6 states:

Ensure all samples, as required by this section, are collected and tested by a laboratory
 accepted by the department for the testing of conventional and priority pollutants, as defined
 by this chapter, and in accordance with the large commercial passenger vessel's department
 accepted QA/QCP and VSSP;

We are concerned and seek assurance that the State of Maine will accept EPA certified laboratories that are being used for the same purposes in providing testing results to other states in accordance with their legislation. This is particularly important due to the sample results that must be submitted in advance of the ship arriving in Maine waters (reference paragraph 5.A.1 regarding a sampling plan for the current operating season to be submitted at least 90 but not more than 120 days before arriving in Maine waters.)

Currently, ICCL members utilize accredited laboratories and Standard Test Methods published by the US Environmental Protection Agency for the sampling, chain-of-custody and laboratory testing of graywater and blackwater samples. The laboratories are audited regularly to maintain the accreditation. The test data from the ongoing GW/BW sampling programs for the advanced water purification systems from these laboratories can be submitted to the State of Maine in accordance with these rules.